

## Attachment 1: SNAP Retailer Applications Burden Narrative Reporting Requirements--Part 278-279

There are currently six application forms currently approved under OMB No. 0584-0008. For this submission to OMB, FNS is seeking approval, with revisions, for the information collection associated with forms FNS-252, FNS-252-E, FNS-FE, FNS-252-R, FNS-252-2, and FNS-252-C.

### **1. Form FNS-252:**

For the burden associated with forms FNS-252, FNS-252-E and FNS-252-FE, for initial authorization, we used the number of applications received as of September 31, 2016 (34,639) as the base number for current estimates. Based on Program growth, we estimate a 2 percent annualized increase in each Fiscal Year (FY), and we used 36,043.12 ( $35,331.78 + 36,038.41 + 3,759.18/3 = 36,043.12$ ) in our calculations for FY 2017. We estimate approximately 1,441.72 ( $4\% \times 36,043.12$ ) applications received will be submitted using the paper application, form FNS-252. Due to changes to the application form, we estimate that it takes respondents, on average, 19 minutes (or 0.3167) to complete form FNS-252, and a total burden hours calculated to be 456.59 ( $1,441.72 \times 0.3167$ ).

### **2. Form FNS-252-E:**

In FY 2017, we estimate approximately the number of respondents completing form FNS-252-E will decrease due to a subset of these respondents will complete the revised form FNS-252-C. We estimate 32,799.23 ( $91\% \times 36,043.12$ ) retailers will complete the online application, form FNS-252-E. We estimate that it takes respondents, on average, 15 minutes (0.25) an increase from 10.6 minutes (or 0.16861) to complete form FNS-252-E, and a total burden hours calculated to be 8,199.80 ( $32,799.23 \times 0.25$ ).

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We estimate approximately 1,802.15 (5% x 36,043.12) Farmers' Market respondents will complete form FNS-252-FE. We estimate that it takes respondents, on average, 15 minutes (or 0.25) to complete form FNS-252-FE, and a total burden hours calculated to be 450.53 (1,802.15 x 0.25).

**4. eAuthentication:**

Applicants using form FNS-252-E or FNS-252-FE must also first self-register for a Level 1 access account through the USDA eAuthentication system in order to initially start an online application. USDA eAuthentication facilitates the electronic authentication of an individual and it takes approximately 8 minutes (or 0.13360) to obtain an eAuthentication account. We estimate approximately 34,601.38 (32,799.23 (FNS-252-E) + 1,802.15 (FNS-252-FE)) retailers and farmers' market applicants will register for Level 1 access. The total burden hours for eAuthentication are calculated to be 4,622.74 (34,601.38 x 0.13360).

**5. Form FNS-252-2:**

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In FY 2016, approximately 372 Meal Service Applications, form FNS-252-2, were submitted to FNS. We used this number as the base number for current estimates. We estimate on average, a 1 percent annualized increase in each FY, and we used 379.48 ( $375.72 + 379.47 + 383.26/3 = 379.48$ ) will complete form FNS-252-2 in our calculations for FY 2017. We estimate that it takes respondents, on average, 15 minutes (0.25) an increase from 12.39 minutes (0.2108) to complete form FNS-252-2, and a total burden hours calculated to be 94.87 ( $379.48 \times 0.25$ ).

### 6. Form FNS-252-C:

Approximately 4,594 Corporate Supplemental Application, form FNS-252-C used for individual (chain) stores under a corporation were submitted to FNS in FY 2016. We estimate on average, an annualized increase of 2 percent of applications 4,770.01 ( $4,685.88 + 4,779.59 + 4,844.58/3 = 4,770.01$ ) will be submitted on form FNS-252-C.

We also estimate that it takes retailers 15 minutes (or 0.25) to complete form FNS-252-C, and a total burden hours calculated to be 1,192.50 ( $4,770.01 \times 0.25$ ).

### 7. Store Visit estimates:

During authorization or reauthorization, FNS may conduct an on-site store visit of the firm. An FNS representative or store visit contractor obtains permission to fill in the store visit checklist and photograph the store.

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We estimate an FNS representative or contractor interacts, on average, one minute (0.11670) with the respondent. Approximately 40,522 store visits were conducted in FY 2016, and we used this as our basis for our calculations. Due to program changes and program integrity initiatives, we estimate a 2 percent annualized increase in each FY. We estimate 42,164.59 store visits will be conducted  $(41,332.44 + 42,159.08 + 43,002.26/3 = 42,164.59)$  in FY 2017, and a total burden hours calculated to be 704.14  $(42,164.59 \times 0.01670)$ .

**8. Form FNS-252-R:**

The estimated burden hours associated with form FNS-252-R is determined from the number of currently reauthorized (14,071) stores. FY 2016 data was used as the base number for our estimates due to the current reauthorization cycle currently in process at this time. We estimate on average, an annualized increase of 2 percent in each FY. We estimate 14,641.37 stores will be subject to reauthorization in FY 2017  $(14,352.42 + 14,639.46 + 14,932.24/3 = 14,641.37)$ . We estimate that it takes respondents 15 minutes (0.25) to complete form FNS-252-R, and a total burden hours calculated to be 3,660.34  $(14,641.37 \times 0.25)$ .

There are no recordkeeping burden requirements associated with this information collection.

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